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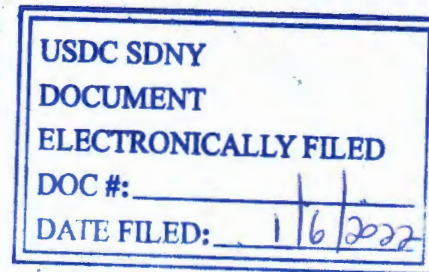
Jacob H. Zamansky
Edward H. Glenn, Jr.
Samuel Bonderoff
Matthew P. Hendrickson

Mohammad R. Nasereddin

January 3, 2022

VIA ECF

Hon. Colleen McMahon
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street, Room 2550
New York, New York 10007



Re: ***Larry W. Jander and Richard J. Waksman v. Retirement Plans Committee of IBM, Richard Carroll, Martin Schroeter, and Robert Weber***
Civil Action No. 15-cv-3781 (WHP)

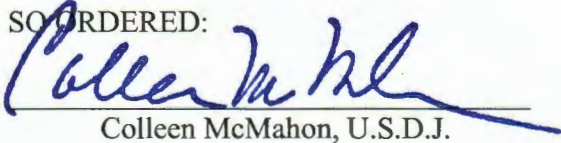
Dear Judge McMahon,

On behalf of plaintiffs Richard Waksman and Larry Jander, we write pursuant to this Court's order of July 22, 2021 (Dkt. 135), to inform the court that the Settlement Administrator and the Recordkeeper, as those terms are defined in the Plan of Allocation (Dkt. 117-6), have confirmed that more than 75% of the Net Settlement Fund has now been distributed to members of the Settlement Class. We, therefore, request that the Court enter an order directing CRIS to disburse the following amounts from the Net Settlement fund. First, \$1,425,000 in attorneys' fees to Class Counsel, Zamansky LLC. Second, \$126,984 in Settlement Administration Expenses to the Settlement Administrator, Rust Consulting.

We are available at the Court's convenience to answer any questions.

Respectfully submitted,
/s/ Matthew P. Hendrickson

SO ORDERED:


Colleen McMahon, U.S.D.J.

1/6/2022